

WEIL, GOTSHAL & MANGES LLP
Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO TWENTIETH SECURITIES
CLAIMS OMNIBUS OBJECTION
(DUPLICATE CLAIMS) AND REQUEST
FOR ORDER BY DEFAULT AS TO
UNOPPOSED OBJECTIONS**

[Re: Dkt. No. 11930]

**Resolving Objections Set for Hearing
March 29, 2022 at 10:00 a.m. (Pacific Time)**

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that the Court enter an order by default on the *Reorganized Debtors’ Twentieth Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 11930] (the “**Twentieth Securities Claims Omnibus Objection**”).

**RELIEF REQUESTED IN THE
TWENTIETH SECURITIES CLAIMS OMNIBUS OBJECTION**

The Twentieth Securities Claims Omnibus Objection seeks to disallow and expunge certain proofs of claim that duplicate others submitted in the Chapter 11 Cases. The claims subject to the Twentieth Securities Claims Omnibus Objection are listed in **Exhibit 1** to that Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Twentieth Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 11932] (the “**Notice of Hearing**”). The Twentieth Securities Claims Omnibus Objection was supported by the *Declaration of Justin R. Hughes in Support of Reorganized Debtors’ Twentieth Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 11931] (the “**Hughes Declaration**”). The Twentieth Securities Claims Omnibus Objection, the Notice of Hearing, and the Hughes Declaration were served as described in the *Certificate of Service* of Sonia Akter, filed on February 22, 2022 [Docket No. 11961] (the “**Certificate of Service**”). As further described in the Certificate of Service, on February 15, 2021, each holder of a claim listed on **Exhibit 1** to the Twentieth Securities Claims Omnibus Objection received a notice including the claim number, debtor, claim amount, and the basis for the Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Twentieth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following informal responses:

Docket No.	Claimant	Claim No.	Resolution
Informal	Boston Retirement Board	107423	Claimant has WITHDRAWN this claim that is subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection is moot as to this claim.
Informal	IBRD Retired Staff Benefits Plan & Trust - Montgomery Core	107454	Claimant has WITHDRAWN this claim that is subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection is moot as to this claim.
Informal	LACERA - LA County Employees Retirement Assoc.	107620	Claimant has WITHDRAWN this claim that is subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection is moot as to this claim.
Informal	Pacific Rim-Fixed	107337	Claimant has WITHDRAWN this claim that is subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection is moot as to this claim.
Informal	Pension Benefit Guaranty Corporation	107346	Claimant has WITHDRAWN this claim that is subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection is moot as to this claim.
Informal	Prudential VCAGI2007MCF	107534	Claimant has WITHDRAWN this claim that is subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection is moot as to this claim.
Informal	SEI Investments Global, Ltd (SGMF)	107386	Claimant has WITHDRAWN this claim that is subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection is moot as to this claim.

Docket No.	Claimant	Claim No.	Resolution
Informal	WEC Energy Group, Inc.	107471	Claimant has WITHDRAWN this claim that is subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection is moot as to this claim.
Informal	Providence Health & Services - Professional & General Liability	107321	Claimant has WITHDRAWN one of the two duplicate claims subject to the Twentieth Securities Claims Omnibus Objection, and therefore the Twentieth Securities Claims Omnibus Objection has been WITHDRAWN with respect to this claim.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a member of the law firm of Weil, Gotshal & Manges LLP (“Weil”), counsel for the Reorganized Debtors.
2. The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Twentieth Securities Claims Omnibus Objection except as described herein.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed “Claim to be Disallowed and Expunged” in **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Twentieth Securities Claims Omnibus Objection, except as otherwise discussed above.

Dated March 22, 2022

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors